



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.
COMMISSIONER

BILL HASLAM
GOVERNOR

May 2, 2016

Via Electronic Mail to kevin.p.marek.civ@mail.mil

Kevin Marek
A7AM, Shepperd Hall
3501 Fetchet Ave., Joint Base
Andrews, Maryland 20762

Dear Kevin Marek:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Air National Guard (ANG) *Draft Environmental Assessment for Installation Development Plan 134th Air Refueling Wing McGhee Tyson Airport (Draft EA)*. The applicant, ANG, has proposed construction, renovation, demolition, and circulation improvement projects for several facilities in its Installation Development Plan (IDP) for McGhee Tyson Air National Guard Base (ANGB) in Blount County, Tennessee. The IDP provides a guide for growth and development of the installation over the next 20 years. The purpose of the proposed construction, renovation, and demolition projects at McGhee Tyson ANGB is to provide adequate facilities and infrastructure for use by the 134th Air Refueling Wing of the Tennessee ANG in fulfillment of the unit's missions. The projects would also help accomplish long-term development goals established in the unit's IDP.

Actions considered in detail within the Draft EA include:

- Alternative 1 – No Action Alternative – Under the No Action Alternative, ANG would not implement the proposed short-term construction, relocation, and demolition projects and existing facility deficiencies and security risks would continue to impair the 134th Air Refueling Wing's ability to conduct its mission.
- Alternative 2 – Proposed Action – ANG would construct maintenance hangar and avionics additions, construct the Training and Education Center (TEC) Billeting Office, complete athletic field improvements, complete secondary gate Anti-Terrorism (AT) improvements, remove and replace non-AT compliant parking, construct pedestrian sidewalks, construct an addition to building 263, and demolish building 90100 over the next twenty years on the ANGB in Blount County, Tennessee. Systematic implementation of the development plan should result in proper facility siting, more functional land-use patterns, and coordinated infrastructure improvements.
- Alternative 3 – Repair Fuel Systems Maintenance Dock – Under this alternative, ANG would repair the existing fuel systems maintenance dock and install new ventilation and fire suppression systems to the existing hangar and avionics shops. ANG would also construct a 3,362 square foot addition to Building 111 to provide a more functional and energy-efficient facility under this alternative. With the exception of the proposed maintenance hangar and avionics shops, all other projects described for the Proposed Action would be implemented as described in Section 2.2 "Proposed Action." No other actions, construction, or demolition would be implemented under this alternative.

- Alternative 4 – Relocation of the Secondary Gate – Under this alternative, ANG would address potential conflicts related to the runway extension and associated road relocation by relocating and constructing the secondary gate at the ANG lease boundary with a fenced corridor along Ambrose Street. Establishment and operation of this relocated gate would secure access to the installation. All other projects described for the Proposed Action would be implemented as described in Section 2.2 “Proposed Action.” No other actions, construction, or demolition would be implemented under this alternative.

TDEC’s **Tennessee Geological Survey (TGS)** has reviewed the Draft EA and has no specific comments regarding the proposed actions.

TDEC’s **Division of Air Pollution Control (APC)** has reviewed the Draft EA and has the following comments on the proposed actions:

- APC comments that Table 3-2 in Section 3.2.2.4 “Mobile Source Emissions at McGhee Tyson ANGB” references out of date Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS) and recommends that ANG reference the current EPA NAAQS in the Final EA.¹
- APC notes that the proposed actions in the Draft EA include the demolition of buildings on site and recommends that ANG take all actions necessary to mitigate any fugitive emissions resulting from onsite construction activity. If any structures are demolished, APC comments that an asbestos demolition notification provided in advance and proper pre demolition surveys to identify the presence of any regulated asbestos containing materials would be required.
- If any open burning activity of tree or limb debris is being considered as part of the proposed actions, APC recommends that ANG include in the Final EA that such activities will be conducted in a manner to encourage responsible smoke dispersion and in accordance with the state open burning regulatory requirements.²
- Under Section 3.2.2.4 “Mobile Source Emissions at McGhee Tyson ANGB,” APC recommends that ANG include analysis of the current mobile source emissions and future projected mobile source emissions following the completion of the proposed actions in the context of the proposed actions in the Final EA.

TDEC’s **Division of Natural Areas (DNA)** has reviewed the Draft EA and, based on the project location and description and the lack of rare species known to the area, does not anticipate adverse impacts to state-listed rare, threatened or endangered plant species.³

TDEC’S **Division of Water Resources (DWR)** has reviewed the Draft EA and comments that the proposed actions may require ANG to receive a construction stormwater permit from TDEC in order to begin construction. DWR recommends ANG contact the TDEC Knoxville Field Office to determine the type of permit that may be needed.⁴

¹ The current EPA NAAQS table is available at <https://www.epa.gov/criteria-air-pollutants/naaqs-table>.

² TDEC APC Rule 1200-3-4-.01 *et seq.*, <http://share.tn.gov/sos/rules/1200/1200-03/1200-03-04.pdf>. Additional information on open burning in Tennessee is available at <https://tn.gov/environment/article/apc-open-burning> and <http://www.burnsafetn.org/>.

³ DNA may only provide comments for state-listed plants because it does not have jurisdiction over state-listed animal species or federally-listed species. The Tennessee Wildlife Resources Agency and U.S. Fish and Wildlife Services would be able to comment on state-listed animal species and federally-listed species, respectively.

⁴ The TDEC Knoxville Environmental Field Office can be reached at 865-594-6035.

TDEC's **Division of Solid Waste Management (DSWM)** has reviewed the Draft EA and has the following comments on the proposed actions:

- Based on the information in the DSWM Waste Activity and Audit Section, DSWM comments that the ANGB is a small quantity hazardous waste generator, ID number TN4570024196. DSWM comments that the proposed activities at the site are anticipated to allow for the same generator status at completion.⁵
- Under Section 3.13.2.1 "Hazardous Materials and Wastes," DSWM comments that the Draft EA refers to the 2008 Hazardous Waste Management Plan (2008 HWMP) under Federal regulations implementing the Resource Conservation and Recovery Act (RCRA) and notes that the 2008 HWMP was not included for review. DSWM recommends that the 2008 HWMP be reviewed and modified, if necessary, to meet the Rules of the Tennessee Department of Environment and Conservation, Hazardous Waste Management, Chapter 0400-12 and that a copy be included in the Final EA.⁶
- Under Section 4.13.21 "Proposed Action," DSWM comments that any asbestos generated would need to be handled and disposed of in accordance with all applicable Federal, state, and local regulations. DSWM comments that all asbestos disposed of in the state of Tennessee needs to be disposed of at a facility which is permitted to receive asbestos and recommends that ANG include potential disposal facilities within the context of the proposed actions in the Final EA.
- Based on the information available in TDEC's WasteBin database and files and Enforcement DataViewer, DSWM did not identify any solid waste associated sites or facilities in proximity to the proposed project boundaries. Tennessee's Solid Waste Management program dates back to 1972, so there could conceivably be disposal in this area that predates TDEC's program. Any wastes which may be unearthed during the project would be subject to a hazardous waste determination, and must be managed appropriately. DSWM recommends that ANG consider the management of potential wastes unearthed in the context of the proposed actions in the Final EA.

TDEC's **Division of Underground Storage Tanks (UST)** has reviewed the Draft EA and has the following comments on the proposed actions:

- UST comments that there are several underground storage tanks on the property and recommends that ANG contact the TDEC Knoxville Environmental Field Office and that proper paperwork be filed with the TDEC Nashville Central Office if any construction will involve these tanks or any new tanks will be installed as part of the proposed actions.⁷
- If a release should occur from any petroleum underground storage tanks during construction, UST comments that ANG will be required to notify the TDEC Knoxville Environmental Field Office within 72 hours and take other necessary and required actions.⁸

TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

⁵ The plan has identified hazardous waste accumulation points, satellite accumulation points, and a central accumulation point for the completed facility.

⁶ TDEC DSWM Rule0400-12 *et seq.* available at <http://share.tn.gov/sos/rules/0400/0400-12/0400-12.htm>.

⁷ The TDEC Knoxville Environmental Field Office can be reached at 865-594-6035. The TDEC Nashville Central Office notification section can be reached at 615-532-0966.

⁸ Additional information on necessary and required actions is available at <http://tn.gov/environment/article/ust-suspected-or-confirmed-release> and <http://tn.gov/environment/topic/ust-suspected-or-confirmed-release>.

Sincerely,

A handwritten signature in blue ink that reads "Kendra Abkowitz". The signature is written in a cursive, flowing style.

Dr. Kendra Abkowitz
Director of Policy and Planning
Phone: (615)-532-8689

cc: Ron Zurawski, TDEC, TGS
 Lacey Hardin, TDEC, APC
 Stephanie A. Williams, TDEC, DNA
 James Sutherland, TDEC, DWR
 Lisa Hughey, TDEC, DSWM
 Michelle Pruett, TDEC, UST